Worksheet
Determination of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management

OFFICE: Humboldt River Field Office, LLNVW01000

TRACKING NUMBER: DOI-BLM-NV-W010-2015-0041-DNA

CASEFILE/PROJECT NUMBER: Star Creek – JV22

PROPOSED ACTION TITLE/TYPE: Star Creek (JV22) Fire Emergency Stabilization and Rehabilitation Plan

LOCATION/LEGAL DESCRIPTION:

Invasive Species Management
T. 31 N., R. 34 E., sec. 25, 26, 35, 36
Aerial Seeding
T. 31 N., R. 34 E., sec. 25, 26, 35, 36

APPLICANT (if any): Bureau of Land Management

BACKGROUND:

The Star Creek Fire was ignited by lightening on 7/2/2015 and contained on 7/3/2015.

The Star Creek Fire occurred on the east side of the Humboldt Mountain Range. The fire area burned previously in the 1999 Unionville Fire. The entire fire area is classified as mule deer crucial summer habitat and year-round pronghorn habitat as defined by the Nevada Department of Wildlife. The area is also heavily utilized by grassland birds and migratory birds and is near raptor nesting sites. There is Greater-Sage Grouse Other Habitat Management Area within the project. The loss of shrub cover, which did not reestablish will negatively affect these species which utilize shrubs for cover, foraging, and nesting. Obscure scorpionflower (*Phacelia inconspicua*), a special status species, has been identified in the adjacent mountains and its habitat could be threatened due to increasing populations of non-native annuals caused by the Star Creek Fire.

The fire area has known populations of invasive annuals including cheatgrass *(Bromus tectorum)* and the Class B noxious weed, medusahead rye *(Taeniatherum caput-medusae)*. Failure to treat this area could result in monocultures of cheatgrass and medusahead due to the lack of competition from native species directly after a fire.

The soils in this fire area are identified as moderately erosive to wind and water events. The nature of these soils will contribute to accelerated soil loss due to the loss of shrub

and grass cover. The fire burned within two soil map units, containing three soil components each. The different soil components are associated with different rangeland ecological sites. The possible rangeland ecological sites are R024XY028NV, which is a south slope site receiving 8-12" of precipitation annually, R024XY031NV, which is a shallow calcareous loam site receiving 10-14" precipitation annually, R024XY021NV, which is a loamy slope 12-14" precipitation annually, R024XY005NV, which is a loamy 8-10" precipitation annually, and R024XY002NV, which is a loamy site receiving 5-8" of precipitation annually.

Rangeland Ecological Site	**The vegetation community in reference condition, is typically dominated by:**
R024XY028NV	Wyoming sagebrush (*Artemesia tridentata ssp. wyomingensis*) and Thurber's needlegrass (*Achnatherum thurberianum*).
R024XY031NV	black sagebrush (*Artemesia nova*), Thurber's needlegrass (*Achnatherum thurberianum*), and bluebunch wheatgrass (Pseudoroegneria spicata).
R024XY021NV	mountain sagebrush (Artemesia tridentata ssp. vaseyana), bluebunch wheatgrass (Pseudoroegneria spicata), and Idaho fescue (*Festuca idahoensis*).
R024XY005NV	Wyoming sagebrush (*Artemesia tridentata ssp. wyomingensis*) and Thurber's needlegrass (*Achnatherum thurberianum*).
R024XY002NV	shadscale (*Atriplex confertifolia),* bud sagebrush (*Picrothamnus desertorum*) and Indian ricegrass (*Achnatherum hymenoides*).

The fire burned a cumulative total of 181 acres, with 96 acres of BLM-administered lands burned, and 85 acres of private land burned within in the Star Peak Grazing Allotment. It is estimated that closure to livestock use of the lands affected by the fire would reduce annual use in the Star Peak Grazing Allotment by 4 Animal Use Months (AUMs).

A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures.

Invasive Plants and Noxious Weeds Management:

Manage invasive species within the fire-affected area to limit further infestation through active treatment of previously existing and newly established infestations of noxious weeds. Up to 96 acres of noxious weed infestations would be treated annually during 2015, 2016, and 2017. Treat ground seeded areas with Plateau (Imazapic) herbicide to control the Class B noxious weed, medusahead rye plants in year one. Coordinate Plateau treatment with seeding activities to advantage germination and seedling establishment of native or selected non-native perennials. Application of Plateau would occur in conjunction with seeding operations and act as seed bed prep for the seeding treatment. Plateau would be applied at a rate of 6-8 oz./acre.

In addition to the Plateau application, located infestations, if any, would be treated with BLM approved herbicides as appropriate, and in compliance with BLM operating procedures and label requirements for BLM approved herbicides. Localized treatments may include one or more of the following chemicals depending on species present in project location:

Imazapyr
Glyphosate
2, 4-D
Picloram
Dicamba
Metsulphuron methyl
Clorsulphuron
Imazapic

Herbicides would be applied by aircraft, truck or ATV; herbicide may also be applied with crews utilizing backpack pumps to spray noxious weeds or annual invasive species. All infestations and treatments would be tracked in District GIS layers/shapefiles.

Aerial Seeding

The BLM proposes to aerial seed a total of 96 acres of public land managed by BLM that was burned by the Star Creek Fire. Seeding would occur in the fall or winter of 2016. The possible species the project would seed with are bluebunch wheatgrass (*Pseudoroegneria spicata spp. spicata*), bottlebrush squirreltail (*Elymus elymoides*), Sandberg bluegrass (*Poa secunda*) and crested wheatgrass (*Agriopyron cristatum*).

Objectives for aerial seeding are as follows:

1. Obtain an average of 0.5 sagebrush plants per meter^2 by the end of the third year following fire containment, which occurred on 07/3/2015.
2. Obtain 50% or greater perennial cover of the low potential perennial plant cover for the appropriate ecological site by the end of the third year following fire containment.
3. The aerial seeding would result in lower abundance (density and cover) of invasive annual plant species, and a higher abundance of desirable perennial plant species than the unseeded control areas.
4. Seeded species would be well established and reproducing.

Environmental Protection Measures

The applicable design measures for this proposal are listed below. The existing NEPA documents are listed under section C. These design measures have been reviewed against the Required Designed Features (RDF) in the GSG Plan and ROD. There are no RDF's that have not been addressed below.

All treatments identified will be in accordance with Instruction Memorandum IM-NV-2015-017 Revised Direction for Proposed Activities within Greater Sage-

Grouse Habitat (July 2014), and WO-IM-2014-114 Sage Grouse Habitat and Wildland Fire Management (July 2014).

Aerial Seeding

Applicable measures from the Holloway Fire Emergency Stabilization and Rehabilitation Plans Environmental Assessment DOI-BLM-OR-B060-2013-0003-EA (DR/FONSI 3/1/2013):

> Treatments would occur at a time of year when most birds have migrated out of the area, and birds that remain are highly mobile and able to leave the immediate area. Disturbance effects from aerial seeding would not be measurable on migratory bird populations due to the brief (few hours) amount of time required to spread the seed or apply the herbicide. Most migratory birds would return to the area or resume activity once seeding is complete.

Monitoring

> All treatments would be monitored for efficacy and efficiency using established protocols and design features that are outlined in the Normal Year Fire Rehabilitation Plan Environmental Assessment No.NV-020-04-21 (DR/FONSI 8/19/2004).

Invasive Plants and Noxious Weeds Management

Wildlife and Migratory Birds

Applicable measures from the Winnemucca Wildland Urban Interface (WUI) Fuels Treatment Project Environmental Assessment No.NV-WO10-2010-0011-EA (DR/FONSI 9/20/2010):

> Application of herbicide would not occur within ¼ mile of any known sage grouse lek sites.

Applicable measures from the Holloway Fire ESR DNA DOI-BLM-NV-WO10-2013-0015-DNA (DR/FONSI 12/27/2012):

> During the raptor breeding season, January 1 through August 31, control of noxious weeds would be implemented or delayed in accordance with spatial and temporal recommendations defined in the Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances (USFWS 2002).
>
> Control of noxious weeds would not be conducted within 0.6 miles of active Sage Grouse leks during lekking and nesting season from March 1st through June 30th. Greater Sage-Grouse nest and brood surveys in areas proposed for noxious weeds control efforts will be conducted no more than 10 days and no less than 3 days prior to initiation of disturbance. If active nests and/or broods are located, rehabilitation activities will be delayed until the grouse have voluntarily left the area.

Plateau herbicide application
Applicable measures from the Montana Mountains Cooperative Fuels Treatment Projects Environmental Assessment No. DOI-BLM-NV-WO10-2011-0005-EA (DR/FONSI 8/2/2012):

Plateau application rates (range of rates) and application would be subject to label restrictions and standard operating procedures (SOPs, See Appendix I in EA).

All terrestrial equipment (e.g. vehicles, hand tools, tractors, etc.) to be used in treatments will be washed offsite prior to being brought to the project site, to avoid spreading noxious weed seeds.

Herbicide applications not including Plateau
The use of all other herbicides listed would adhere to the environmental protection measures listed below from the Integrated Weed Management Environmental Assessment NV-020-02-19 (DR/FONSI 8/27/2002).

1. Standard safety procedures and standard operating procedures would be strictly followed.
2. Re-applications of the herbicide would not be less than the persistence factor identified for any product selected for use.
3. Ground applications of herbicides (including backpack and power sprayer) would be limited to spraying the target weeds and the surrounding ground for 10 feet. Backpack applications of liquids would occur only at low nozzle pressure and at ground level. Granular formulations would be applied by broadcast spreaders or by hand within 3.5' of the ground.
4. The BLM would notify the livestock grazing permittee(s) when herbicides are used on grazing allotments. Phenology of target species and multiple use objectives would also be considered.
5. No herbicide application would be conducted when rain (greater than 50% chance) is predicted within 24 hours of treatment. The BLM would use the Interagency Fire Dispatch Center for weather reports for rain predictions.
6. All herbicide spray solutions would be applied with a blue dye so that application sites are visible.

B. Land Use Plan (LUP) Conformance

LUP Name Winnemucca District Planning Area Resource Management Plan and Record of Decision (May 21,2015), as amended by the Record of Decision and Approved Resource Management Plan (GSG Plan and ROD) Amendments for the Great Basin Region Including the Greater-Sage Grouse Sub-Regions of Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, and Utah (September 21, 2015).

*List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto)

The proposed action in conformance with the applicable LUP because it is specifically provided for the following LUP decisions:

The proposed action in is conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objective, terms, and conditions):

VW1.1: Use appropriate integrated vegetation treatments (e.g., chemical, mechanical, prescribed fire, prescribed grazing, cultural, and biological) for the control of invasive and noxious plants. (2-13)

VW3.1: Implement and monitor treatments to control or eradicate invasive annual plants using ES&R treatments, use restrictions, seeding, chemical or biological control, prescriptive grazing, and other integrated weed management practices. (2-14)

VR1.3: Restore and improve degraded rangelands and habitat and/or achieve vegetation management objectives by initiating land treatments. Use management tools, such as prescribed fire, prescribed grazing and fire for multiple objectives including for resource benefits, vegetation manipulation (mechanical, biological, and chemical treatments), fencing, seed and use restrictions. Allow natural recovery due to the presence of surviving perennial plants or a sufficient seed source. (2-15)

VR1.4: Seed burned areas, as appropriate. (2-15)

VR3.1: Close burned areas, new seedlings, or reseeded areas to permitted livestock use, WHB grazing, or other uses until monitoring objectives are achieved or until rehabilitation efforts are determined to have failed. (2-16)

VR4.1: Seed disturbed areas with an appropriate mixture of grasses, forbs, and shrubs. Use a combination of native seed collections and desirable adapted species for rehabilitation and reclamation. Priority for use of seeds, where effective and available, is as follows:

1. Locally collected native seed;
2. Native seeds; then
3. Non-native seeds (desirable adapted species). (2-16)

VR4.2: Treat monocultures of cheatgrass and other non-native invasive and noxious plant communities by chemical, biological, prescribed grazing, prescribed fire, or mechanical methods. Treatment areas will be seeded to reestablish desired vegetation and stabilize soils. Prioritize restoration efforts on important habitat for wildlife and special status species. (2-16)

VR5.1: Native and introduced species will be seeded in areas lacking potential for natural recovery (see VR4.1). (2-16)

VR8.2: In areas lacking sufficient seed source, seed native and introduced plants including shrubs, grasses, and forbs to reestablish vegetation. Allow natural recovery in areas having sufficient seed sources (see VR4.1). (2-17)

WFM6.1: Rehabilitate degraded rangeland by determining and implementing suitable land treatments to achieve ES&R objectives, based on the National Fire Rehabilitation Plan or applicable updates, existing land use plans, and ES&R program guidance (see Objective VR3). (2-34)

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

- Holloway Fire Emergency Stabilization and Rehabilitation Plans Environment Assessment, DOI-BLM-OR-B060-2013-0003-EA (DR/FONSI 3/1/2013)
- Montana Mountains Cooperative Fuels Treatment Projects Environmental Assessment No. DOI-BLM-NV-WO10-2011-0005-EA (DR/FONSI 8/2/2012)
- Winnemucca Wildland Urban Interface Area Treatment Project Environmental Assessment, DOI-BLM-NV-WO10-0011-EA, (DR/FONSI 9/20/2010)
- Paradise Fuelbreak Maintenance Environmental Assessment No.: DOI-BLM-NV-WO10-2010-0009-EA (DR/FONSI 7/19/2010)
- Santa Rosa Fuelbreak Project Environmental Assessment No.: DOI-BLM-NV-WO10-2010-0003-EA (DR/FONSI 2/19/2010)
- Vegetation Treatment Using Herbicides on BLM Lands in Seventeen Western States Programmatic Final Environmental Impact Statement, 07/2007, (ROD 9/29/07)
- Normal Year Fire Rehabilitation Plan Environmental Assessment EA# NV-020-04-21, 06/2004, (DR/FONSI 8/19/04)
- Integrated Weed Management Environmental Assessment NV-020-02-19, 8/07/02, (DR/FONSI 8/27/02)
- Vegetation Treatment on BLM Lands in Thirteen Western States Environmental Impact Statement, 5/91, (ROD 8/91)

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

- IM NV 2015-017 Revised Direction for Proposed Activities within Greater Sage-Grouse Habitat (February 2015)
- WO IM 2014-114 Sage-Grouse Habitat and Wildland Fire Management (July 2014)
- Holloway Fire ESR Determination of NEPA Adequacy DOI-BLM-NV-WO10-2013-0015-DNA (DR 12/27/2012)
- USFWS Biological Opinion for the Normal Year Fire Rehabilitation Plan (August 2004)
- A Report on National Greater Sage-Grouse Conservation Measures. Produced by: Sage-grouse National Technical Team, 12/21/2011 (pp 27)

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Documentation of answer and explanation:
Yes, the Normal Fire Rehabilitation Plan EA-NV-020-04-21 (DR/FONSI 8/19/04), addresses the proposed treatments including aerial seeding. Control of noxious weeds is analyzed in the Normal Fire Rehabilitation Plan EA-NV-020-04-21 (DR/FONSI 8/19/04), Integrated Weed Management EA-NV-020-02-19 (DR/FONSI 8/27/02), and Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States EIS (ROD 9/29/07).

Imazapic is registered for use and analyzed at a national –level in the Vegetation Treatment Using Herbicides on BLM Lands in Seventeen Western States Programmatic Final Environmental Impact Statement, 07/2007, (ROD 9/29/07). This level of study provided a broad regional analysis of Imazapic herbicide use on public land managed by the BLM.

The use of Imazapic herbicide to reduce the amount of annual plant species on BLM-administered public lands is analyzed in site-specific projects in the following EA's: Montana Mountains Cooperative Fuels Treatment Projects Environmental Assessment No. DOI-BLM-NV-WO10-2011-0005-EA (DR/FONSI 8/2/2012), Santa Rosa Cooperative Fuels Treatment Project DOI-BLM-NV-WO10-2010-0003-EA (DR/FONSI 2/19/2010), the Paradise Fuelbreak Maintenance DOI-BLM-NV-WO10-2010-0009-EA (DR/FONSI 7/19/2010), and the Winnemucca Wildland Urban Interface Area Treatment Project DOI-BLM-NV-WO10-2010-0011-EA (DR/FONSI 9/20/2010). The Star Creek Fire project location is sufficiently similar to the site specific geographic conditions and resources analyzed in the existing referenced NEPA documents. The existing EA documents analyze Imazapic herbicide application on similar projects and similar vegetation communities and soils. The analysis includes similar application as Imazapic would be applied by aircraft, truck, or ATV and used to remove and control the growth of annual species such as cheatgrass, tumble mustard, and Russian thistle.

2. Is the range of alternatives analyzed in the existing NEPA documents(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Documentation of answer and explanation:
Yes, the range of alternatives analyzed in the existing NEPA documents are appropriate with respect to the current proposed action and current environmental concerns, interests, resource values and circumstances.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Documentation of answer and explanation
Yes, the existing analysis is adequate. There is new information regarding the current proposal but it does not necessitate new analysis. In 2010, the USFWS found that listing of the Greater Sage Grouse under the Endangered Species Act was warranted, but precluded by higher priority listings actions. Since that time BLM has been taking steps to avoid listing the Greater Sage Grouse by reducing impacts where possible. In 2015, the USFWS announced that the Greater Sage-Grouse does not warrant listing under the Endangered Species Act. Greater Sage Grouse habitat has been delineated to help BLM manage resources and reduce impacts. There is Greater-Sage Grouse Other Habitat Management Area within the project. Based on current and existing resource conditions and the successional stage as evident in site visitation and photos, there is no Greater-Sage Grouse habitat. This conclusion is also based on a GIS desktop review of Greater-Sage Grouse proximity to lekking areas. Because the proposed actions would not affect any Greater Sage Grouse habitat, the analyses conducted in the existing NEPA documents are still applicable.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Documentation of answer and explanation
Yes, the analysis of direct, indirect and cumulative impacts, in the existing NEPA documents serves to disclose sufficiently the potential impacts associated with implementation of the proposed action.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Documentation of answer and explanation
Yes, public involvement and interagency review associated with existing NEPA documents are adequate. In addition, coordination regarding the planned Star Creek Fire ESR actions has occurred between the Winnemucca District Range Management Specialist and the affected permittee in the form of a phone conversation on 09/18/2015.

E. Persons/Agencies/BLM Staff Consulted

Name /Title	Resource/Agency Represented	Signature/Date	Comments (Attach if more room is needed)
Wes Barry	Range Management Specialist	/s/ Wes A. Barry Sept. 28, 2015	N/A
Rob Burton	Vegetation/Soils/Air Quality	/s/ Rob Burton 10/1/2015	
Chris Powell	Cultural Resources	/s/ Chris Powell 10/1/15	none
Matt Yacubic	Cultural Resources (oversight)	/s/ Matt Y 9/28/15	
Bob Gibson	Hydrology/Riparian	/s/ Bob Gibson 10/1/15	pg 1: lightning (none)
Elise Brown	Wildlife	/s/ Elise Brown 9-23-15	
Greg Lynch	Fisheries	/s/ Greg Lynch 10/1/15	
Philip Clauss	GIS	/s/ Philip A Clauss	Highlight in overview.
Melanie Rasor	ESR Lead/Invasive Species	/s/ Melanie Rasor 9-22-15	
Lynn Ricci	NEPA	/s/ Lynn B. Ricci 10/21/15	
Samantha Gooch	Wild Horse/Burro	/s/ S Gooch	none
Zwaantje Rorex	Lands w/ Wilderness Characteristics/ WSA	/s/ Zwaantje Rorex 9/28/15	
Mark Williams	Fire/Fuels	/s/ Mark Williams 5 Oct 15	None
Matt Yacubic	Paleontology	/s/ Matt Y 9/24/15	
Tanner Whetstone	Native American Religious Concerns	/s/ Tanner Whetstone 9/24/2015	
Kurt Miers	Waste, hazardous or solid	/s/ Kurt Miers 10/1/2015	

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

[X] **Conclusion** *(If you found that one or more of these criteria is not met, you will not be able to check this box.)*

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM' compliance with the requirements of the NEPA.

_/s/ Melanie Rasor 10-22-15_____
Signature of Project Lead

_/s/ Lynn B Ricci_____
Signature of NEPA Coordinator

__/s/ A C. King_____ __10/26/15_
Signature of the Responsible Official Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.